

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

DAVID CATANZARO,)	CASE NO. 1:13-cv-00996-DAP
)	
Plaintiff)	JUDGE DAN AARON POLSTER
)	
v.)	DEFENDANTS SEAMAN GARSON,
)	LLC AND JAMES A. DEROCHE'S
SEAMAN GARSON, LLC, et al.)	OFFER OF JUDGMENT PURSUANT
)	TO FED.R.CIV.P. 68
Defendants)	
)	

Defendants Seaman Garson, LLC and James A. DeRoche (herein "Defendants"), by and through counsel and pursuant to Federal Rule of Civil Procedure 68, hereby offer to allow judgment to be taken against them collectively for the total sum of \$25,000.00, inclusive of all litigation costs, fees, and interest. This offer of judgment is made for the purposes specified in Rule 68 only, and is not to be construed as an admission of either the Defendants' liability or the Plaintiff's alleged damages, the existence of which are expressly denied.

This offer is being made more than fourteen (14) days before the commencement of trial. If this offer is rejected, Defendants intend to invoke Rule 68 in its entirety, including provisions providing for the collection from Plaintiff of all applicable costs and expenses subsequently incurred during the course of this litigation.

Respectfully submitted,

/s/Shane A. Lawson

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CERTIFICATE OF SERVICE

I hereby certify that on December 03, 2013, a copy of the foregoing Offer of Judgment was filed electronically. Notice of this filing will be sent by operation of the Court's electronic system to all parties indicated on the electronic receipt. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's system.

/s/Shane A. Lawson

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